

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

ASSURANCE COMPANY OF AMERICA,
A New York Corporation,

Plaintiff, Case No. 06-CV-13371
-vs- Hon.: Arthur Tarnow
Magistrate Judge Steven Pepe

LAVDAS JEWELRY LIMITED, A
Michigan Limited Liability Corporation,

Defendant.

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DEFENDANT LAVDAS JEWELRY LIMITED'S WITNESS LIST

_____**NOW COMES** Defendant, Lavdas Jewelry Limited, by and through their attorneys, **FIEGER, FIEGER, KENNEY, JOHNSON & GIROUX, P.C. , and FABIAN SKLAR & KING, P.C.** and state for their Witness List states as follows:

1. All parties to the lawsuit;

2. Nicholas Lavdas;
3. Maria Lavdas;
4. Tony Scargall - father-in-law;
5. Dennis Scargall - uncle;
6. Cynthia Kendall-Lowe - employee;
7. Jennifer Rocheleau-Langreet - employee;
8. Graziella (Grace) Donofrio - employee;
9. Aannalisa Lamiliza - employee;
10. Sheryl Stopczynski - employee;
11. Pamela Fox - employee;
12. Amanda Glaros - employee
13. Kristen Grzybowski - employee;
14. Emad Abdulghani - employee;
15. Justin Perry - employee;
16. Katherine Beauvais - employee;
17. Patrick Flanagan - Assurance Company of America;
18. Craig Becker - Globe Midwest/Adjusters International (Potential Expert regarding damages, policy coverage and claims handling practices);
19. Chris Mills - insurance agent;
20. Patrick Green - insurance agent;
21. John Green - friend;
22. Jerry Youkelson - customer;

23. Sean Campeau - employee of Lavdas Limousine;
24. Carmen Pohorily - employee of Lavdas Limousine;
25. Michelle Kedrow - Friar Tuck's Manager;
26. T.J. Strickland - Investigator for Zurich/Assurance
27. Pjeter Berishic - suspect;
28. Simon Berishic - suspect;
29. Gjon Gjurashaj - suspect;
30. Henri Sumyk - FBI;
31. Juan Herrera - FBI;
32. Russell Salyers - Warren EMS;
33. Warren EMS - Brinkman (Douglas);
34. Paul Sinda - Warren EMS;
35. Warren EMS - May;
36. Any and all personnel who consulted, treated and/or cared for Nicholas Lavdas at William Beaumont Hospital:
 - a. Dr. Christopher McPeak;
 - b. Dr. Hugh Kerr;
 - c. Dr. William Keye, Jr.; and,
 - d. Dr. Bradford Walters.
37. Warren Police Department, including but not limited to:
 - a. Ron Visbara
 - b. Det. Kevin Woods
 - c. Det. Brendan Brosnan;
 - d. Daryl Tempest
 - e. Daniel Bozek;
 - f. Joseph Ballinger;
 - g. Daniel Novak;

- h. Frank Gasser;
- i. William Reichling;
- j. Michael Caruso;
- k. Michael Kireta;
- l. Randy Costanzo;
- m. Jeffrey Knoblauch;
- n. Kathleen Miller;
- o. Eric Schulz;
- p. Robert Schaffner;
- q. Richard Bewley;
- r. Timothy Maniere;
- s. Paul Westrick;
- t. Brian Gilchrist;
- u. Det. Klik;
- v. Carole Yustick;
- w. Lillian Smolinski;
- x. Capt. Mazzonne;
- y. Lt. Stano; and,
- z. Det. Keitz.

38. James Zender, Ph.D. - treating physician;

39. Guardian Alarm, including but not limited to:

- a. Bill Hodges;
- b. Joseph Fortuna;
- c. Debra/Debi Carey;
- d. Bess Kalergis-Reed (sic);
- e. K. Majaski (sic);
- f. Sandy Flaunoy (sic);
- g. Jeff Nelson;
- h. Flores/#694;
- i. R. Kay (sic); and,
- j. Employee #573.

40. Keeper of the Records for:

- a. Warren Police Department;
- b. Warren EMS;
- c. FBI/Federal Bureau of Investigation;
- d. William Beaumont Hospital;
- e. James Zender, Ph.D., P.C.;
- f. Dr. Tiege;

- g. St. John Urgent Care;
- h. Michigan Institute of Urology;
- i. Henry Ford Hospital;
- j. Cincinnati Insurance Company;
- k. Retailers Mutual Insurance Company;
- l. Globe Midwest/Adjustors International;
- m. Guardian Alarm of Michigan;
- n. Assurance Company of America/Zurich; and,
- o. Zurich Insurance/Assurance Company of America.

41. Cincinnati Insurance Company Claim Representative;

42. Retailers Mutual Insurance Company Claim Representative;

43. Globe Midwest/Adjusters International Claim Representative;

44. Assurance Company of American Claim Representative;

45. Assurance Company of American Claim Representatives past and present including but not limited to adjustors and investigators;

46. Zurich Insurance Claim Representative;

47. Dr. Michael Thomson - Economic Expert
2350 Franklin Road, Suite 200, Bloomfield Hills, MI 48302;

48. Any and all rebuttal witnesses as necessary;

49. Any and all witnesses learned through the course of continued discovery whose names are not identified at this time;

50. Plaintiff reserves the right to supplement and amend this witness list to reflect new witnesses learned throughout discovery; and,

51. Any and all witnesses listed on Defendants' Witness List, whether called at the time of trial or not.

52. Defendant's experts;

53. All witnesses named or referred to in interrogatory answers, depositions, any and all pleadings, investigations and/or claims files or referred to in documents maintained or produced by all parties;

54. Any witness who may have been retained by other parties, whether or not called at the time of trial;
55. Custodian of records for any witnesses list by any party to this action;
56. Any and all witnesses that become known to Defendant through the course of this litigation;
57. All parties to this action, their employees, agents, and representatives under the adverse witness rule where applicable; and,
58. Plaintiff reserves the right to name additional lay and expert witnesses through and including the time of trial in this matter.

Respectfully submitted,

Fieger, Fieger, Kenney, Johnson & Giroux, P.C.

By: /s/ Ven R. Johnson
VEN R. JOHNSON (P39219)
Attorneys for Plaintiffs/Counter Defendant
19390 West Ten Mile Road
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(248) 355-5555

Dated: July 30, 2007

PROOF OF SERVICE

The undersigned hereby certifies that on July 30, 2007, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to the following: Michael J. Black and Stuart Sklar and I hereby certify that I have mailed by United States Postal Service the paper to the following non-ECF participants: none.

/s/ Ven R. Johnson
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